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 8 Facsimile: (510) 874-1460
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 10 Attorney for Defendant
 11 John Morgan

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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TIFFANY TAYLOR, CHRISTOPHER
 JOHNSON, JOHN MORGAN, KIM
 DRAGO, and MICHAEL DOWNEY

Defendants.

Case No. CR-05-00651 CW

**STIPULATION AND [PROPOSED]
 ORDER EXCLUDING TIME FROM
 JANUARY 9, 2006 TO JANUARY 30,
 2006 FROM THE SPEEDY TRIAL ACT
 CALCULATION (18 U.S.C. §
 3161(h)(8)(A))**

CONFIDENTIAL CJA FILE

The United States of America, by and through its attorneys, Kevin Ryan, United States Attorney for the Northern District of California, by Kirstin Ault, Assistant U.S. Attorney, and defendants TIFFANY TAYLOR, CHRISTOPHER JOHNSON, JOHN MORGAN, KIM DRAGO, and MICHAEL DOWNEY, and by their undersigned attorneys, hereby stipulate and agree that the date on which the defendants' pretrial motions shall be served and filed shall be continued from January 9, 2006 to January 30, 2006. The government's opposition shall be served and filed on February 6, 2006, and any replies shall be served and filed on February 15,

1 2006 A hearing on the motions shall be heard on or after February 20, 2006 or as directed by
 2 the Court.

3 The parties hereby stipulate and agree that the time between January 9, 2006 and
 4 January 30, 2006 shall be excluded from the calculation of time in which the trial of the
 5 captioned matter must commence pursuant to the Speedy Trial Act.

6 The grounds for this exclusion are that counsel for defendants require additional time to
 7 consult with their clients in connection with the effective preparation of motions and other
 8 matters related to the defense of the case and to allow for the continuity of counsel in this case,
 9 which make it unreasonable to expect adequate preparation for pretrial proceedings or retrial
 10 within the time limits established by the Speedy Trial Act. The parties agree that the ends of
 11 justice served by the exclusion of this time outweigh the best interests of the public and the
 12 defendants in a speedy trial, all pursuant to 18 U.S.C. § 3161(h)(8)(A) and (B)(iv).

13
 14 Respectfully submitted this 6 th day of January 2006.

15 STIPULATED:

16 DATED: _____

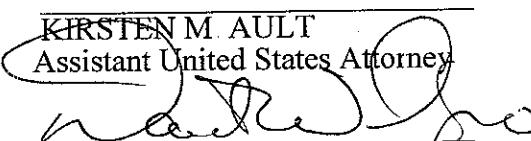
17 DATED: 1/5/06

18 DATED: _____

19 DATED: _____

20 DATED: _____

21 DATED: _____

KIRSTEN M. AULT
 Assistant United States Attorney

 DAVID W. SHAPIRO
 Attorney for Defendant John Morgan

EUGENE ILLOVSKY
 Attorney for Defendant Tiffany Taylor

RANDALL KNOX
 Attorney for Defendant Christopher Johnson

SHANA KEATING
 Attorney for Defendant Kim Drago

1 DATED: _____

2 JEROME MATTHEWS
3 Attorney for Defendant Michael Downey

4 IT IS SO ORDERED:

5 DATED: _____

6 CLAUDIA WILKIN
7 United States District Judge

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THE LITERATURE

1 2006. A hearing on the motions shall be heard on or after February 20, 2006 or as directed by
2 the Court.

The parties hereby stipulate and agree that the time between January 9, 2006 and January 30, 2006 shall be excluded from the calculation of time in which the trial of the captioned matter must commence pursuant to the Speedy Trial Act.

The grounds for this exclusion are that counsel for defendants require additional time to consult with their clients in connection with the effective preparation of motions and other matters related to the defense of the case and to allow for the continuity of counsel in this case, which make it unreasonable to expect adequate preparation for pretrial proceedings or trial within the time limits established by the Speedy Trial Act. The parties agree that the ends of justice served by the exclusion of this time outweigh the best interests of the public and the defendants in a speedy trial, all pursuant to 18 U.S.C. § 3161(b)(8)(A) and (B)(iv).

15 Respectfully submitted this 10th day of January 2006.

STIPULATED:

18 DATED: 15/06

30 DATED: 1/3/06

22 DATED:

24 | DATED:

26 | DATED:

KIRSTEN M. AULT
Assistant United States Attorney

DAVID W. SHAPIRO
Attorney for Defendant John Morgan

EUGENE ILLOVSKY
Attorney for Defendant Tiffany Taylor

RANDALL KNOX
Attorney for Defendant Christopher Johnson

SHANA KEATING
Attorney for Defendant Kim Drago

Jan. 4, 2006 3:53PM

No. 1147 P 3/4

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11 justice served by the exclusion of this time outweigh the best interests of the public and the
12 defendants in a speedy trial, all pursuant to 18 U.S.C. § 3161(h)(8)(A) and (B)(iv).

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14
15 Respectfully submitted this ____th day of January 2006.

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17 STIPULATED:

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DATED: _____

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20 DATED: 1/3/06

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22 DATED: 1/5/06

23

24 DATED: _____

25

26 DATED: _____

27

28

KIRSTEN M. AULT
Assistant United States Attorney

DAVID W. SHAPIRO
Attorney for Defendant John Morgan

EUGENE ILLOVSKY
Attorney for Defendant Tiffany Taylor

RANDALL KNOX
Attorney for Defendant Christopher Johnson

SHANA KEATING
Attorney for Defendant Kim Drago

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10 within the time limits established by the Speedy Trial Act. The parties agree that the ends of
11 justice served by the exclusion of this time outweigh the best interests of the public and the
12 defendants in a speedy trial, all pursuant to 18 U.S.C. § 3161(h)(8)(A) and (B)(iv).

13
14 Respectfully submitted this ____th day of January 2006.

15 STIPULATED:

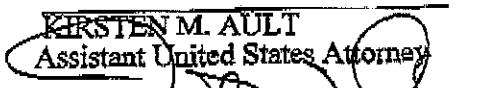
16 DATED: _____

17 DATED: 1/3/06

18 DATED: _____

19 DATED: 1/6/06

20 DATED: _____

KIRSTEN M. AULT
Assistant United States Attorney


DAVID W. SHAPIRO
Attorney for Defendant John Morgan


EUGENE ILLOVSKY
Attorney for Defendant Tiffany Taylor


RANDALL KING
Attorney for Defendant Christopher Johnson


SHANA KEATING
Attorney for Defendant Kim Drago


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11 justice served by the exclusion of this time outweigh the best interests of the public and the
12 defendants in a speedy trial, all pursuant to 18 U.S.C. § 3161(h)(8)(A) and (B)(iv).

13
14
15 Respectfully submitted this ____th day of January 2006.

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17 STIPULATED:

18 DATED: _____

19 DATED: 1/5/06

20 DATED: _____

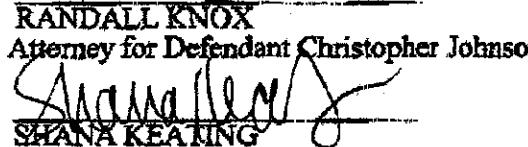
21 DATED: _____

22 DATED: 1/14/06

KIRSTEN M. AULT
Assistant United States Attorney


DAVID W. SHAPIRO
Attorney for Defendant John Morgan

EUGENE ILLOVSKY
Attorney for Defendant Tiffany Taylor

RANDALL KNOX
Attorney for Defendant Christopher Johnson

SHANA KEATING
Attorney for Defendant Kim Drago

Jan 4 2006 3:59PM

No. 1147 P. 4/4

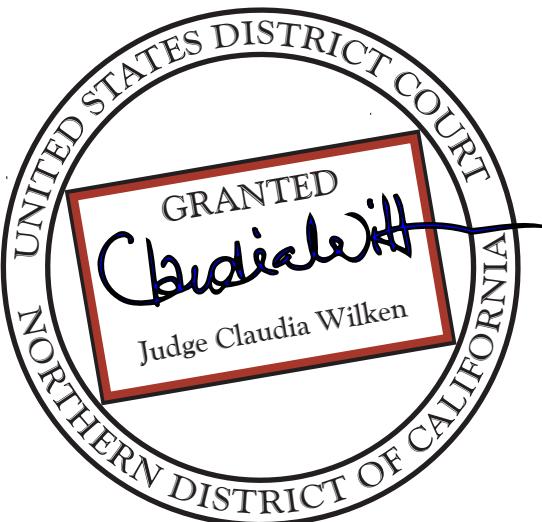
1 DATED: 1/4/06
JEROME MATTHEWS

Attorney for Defendant Michael Downey

3 IT IS SO ORDERED: Hearing on motions will be held on 2/27/06 at 2:00 p.m.

4 1/10/06

5 DATED: _____

CLAUDIA WILKIN
6 United States District JudgeBONES, SCHILLER & FLEXNER LLP
OAKLAND, CALIFORNIA

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STIPULATION AND [PROPOSED] ORDER EXCLUDING TIME FROM JANUARY 9, 2006 TO JANUARY 30, 2006 FROM THE
SPEEDY TRIAL ACT CALCULATION (18 U.S.C. § 3161(h)(8)(A))

01/04/2006 WED 15:01 [TX/RX NO 7152]